

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

LEEROY CROWLEY,

Plaintiff,

Case No.: 11-cv-578

v.

NCO FINANCIAL SYSTEMS, INC.,

Defendant.

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**NOTICE OF PLAINTIFF'S DEPOSITION AND REQUEST FOR PRODUCTION**

**TO: PLAINTIFF ABOVE-NAMED**, and his Attorney, J. Mark Meinhardt, 4707 College Boulevard, Suite 100, Leawood, KS 66211:

Please take notice that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, defendant NCO Financial Systems, Inc. (hereinafter referred to as "NCO"), will take the deposition testimony of Plaintiff **LeeRoy Crowley, a/k/a Lee Roy Crawley**, upon oral examination under oath or affirmation before a Notary Public, or other officer duly authorized by law to administer oaths, by stenographic means, on **Wednesday, November 30, 2011**, commencing at **10:00 o'clock a.m.** and continuing until completed, at the offices of Wallace, Saunders, Austin, Brown & Enochs, Chtd., 2300 Main Street, Suite 900, Kansas City, Missouri 64108.

Defendant NCO hereby requests, pursuant to Rules 30(b)(5) and 34 of the Federal Rules of Civil Procedure, that at the time of the deposition Plaintiff LeeRoy Crowley, a/k/a Lee Roy Crawley produce the following documents, if they have not been previously produced to defendant:

1. All documents in Plaintiff's possession, custody or control, whether or not Plaintiff intends to use them at a trial of this matter, relating to the AIS Services, LLC account and/or any other account made the basis of Plaintiff's claim against NCO in this lawsuit.
2. All documents in Plaintiff's possession, custody or control, whether or not Plaintiff intends to use them at a trial of this matter, supporting the allegations in Plaintiff's Complaint regarding the actions and conduct of NCO.
3. All documents in Plaintiff's possession, custody or control, whether or not Plaintiff intends to use them at a trial of this matter, sent by Plaintiff to NCO or received by Plaintiff from NCO.
4. All calendars, diaries, logs, notes, journals, or other written or recorded summaries of events, in Plaintiff's possession, custody or control, whether or not Plaintiff intends to use them at a trial of this matter, that were kept by Plaintiff and pertain to Plaintiff's dispute with NCO, and/or which otherwise pertain to the lawsuit.
5. All written or recorded statements of any type in Plaintiff's possession, custody or control, whether or not Plaintiff intends to use them at a trial of this matter, or given by Plaintiff to her counsel, from any witness, or any individual, that in any way pertain to Plaintiff's allegations in the Complaint.
6. All audio recordings in Plaintiff's possession, custody or control, whether or not Plaintiff intends to use them at a trial of this matter, of any telephone messages and/or conversations between Plaintiff and NCO, which conversations and/or messages in any way pertain to the AIS Services, LLC account and/or any other account made the subject of this lawsuit.
7. All documents in Plaintiff's possession, custody or control, whether or not Plaintiff intends to use them at a trial of this matter, supporting the allegations that Plaintiff sustained damages as a result of NCO's conduct as alleged in the Complaint filed in the above-captioned civil action.
8. All statements in Plaintiff's possession, custody or control, whether or not Plaintiff intends to use them at a trial of this matter, taken by Plaintiff or on Plaintiff's behalf from any person in any way pertaining to the claims alleged in the Complaint filed in the above-captioned civil action.
9. All documents that Plaintiff expects to introduce as evidence or otherwise use in any manner at a trial of this matter.
10. A complete copy of Plaintiff's credit reports from any of the consumer reporting agencies, including, but not limited to, Experian, Equifax, and Transunion.

11. All tangible reports, physical models, compilations of data, and other materials prepared by or for any expert who may testify for Plaintiff at any trial or deposition in this lawsuit.
12. All documents identified in Plaintiffs' Fed. R. Civ. P. Rule 26(a)(1) disclosures issued in this lawsuit.

Dated: November 15, 2011

/s/ Paul Croker  
Paul Croker  
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*Attorneys for Defendant  
NCO Financial Systems, Inc.*

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 15, 2011 I electronically filed the foregoing ***NOTICE OF PLAINTIFF'S DEPOSITION AND REQUEST FOR PRODUCTION*** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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/s/ Paul Croker  
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For the Firm